ORIGINAL

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

In the Matter of	)	
	)	
Amendment of Section 73.606(b)	)	MM Docket No. 01-323
Table of Allotments	)	RM - 10337
Television Broadcast Stations	)	
(Vernal and Santaquin, Utah,	)	
Ely and Caliente, Nevada)	)	

To: Chief, Allocations Branch
Policy & Rules Division
Mass Media Bureau

COMMENTS

TV 6, L.L.C., permittee of VHF TV Station KBCJ, Channel 6, Vernal, Utah and Kaleidoscope Foundation, Inc., permittee of VHF TV Station KBNY, Channel 6, Ely, Nevada (collectively, the "Petitioners"), by their counsel, submit their comments to the Notice of Proposed Rule Making, DA 01-2736 (rel. Nov. 23, 2001) ("NPRM") in the above-captioned proceeding. The NPRM proposed to (i) delete VHF TV Channel 6 at Vernal, Utah and allot VHF Channel 6 to Santaquin, Utah and modify the KBCJ permit accordingly; and (ii) delete VHF Channel 6 at Ely, Nevada and allot VHF Channel 6 to Caliente, Nevada and modify the KBNY permit accordingly. In support hereof, Petitioners state as follows:

I. INTRODUCTION

1. The Petitioners filed their petition for rule making on April 27, 2000. The Petition showed that by making two related modifications to the TV Table of Allotments, the public interest could be furthered by expanding television service and better distributing stations among the various communities. The Petition demonstrated that KBJC, Channel 6, could be reallotted from Vernal, Utah to Santaquin, Utah (the "Santaquin reallotment") in compliance with the Commission's spacing

rules, provided that KBNY, Channel 6, were reallotted from Ely, Nevada to Caliente, Nevada (the "Caliente reallotment"), also in compliance with the Commission's spacing rules. The Petition also demonstrated that grant of the Petition was in the public interest, because it would further the Commission's top three priorities in television allotments.[1]

2. In these Comments, the Petitioners respond directly to a number of points raised in the NPRM. Because the technical information in the NPRM differs so widely from the technical information supplied in the Petition, the Petitioners performed an additional technical analysis to substantiate their original results. *See* Technical Narrative. The Petitioners had filed their original technical narrative as a supplement on July 25, 2000, since it appeared that the original engineering had become dissociated with the Petition.

3. As a final preliminary matter, the Petitioners hereby state that if the Commission grants the modifications proposed in the NPRM, the Petitioners will apply for facilities at Santaquin and Caliente, respectively, and construct the facilities if the applications are granted.

II. THE PROPOSED MODIFICATIONS WILL RESULT IN A PREFERENTIAL ARRRANGEMENT OF ALLOTMENTS UNDER THE COMMISSION'S TELEVISION ALLOTMENT PRIORITIES.

4. As discussed more fully below, grant of the Petition is in the public interest since it will result in a preferential arrangement of allotments. Because the Santaquin reallotment is dependent upon the Caliente, reallotment, the two proposals should be considered together for

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[1] The Commission's television allotment priorities are: (1) to provide at least one television service to all parts of the United States, (2) to provide each community with at least one television broadcast station, (3) to provide a choice of at least two television services to all parts of the United States, (4) to provide each community with at least two television broadcast stations, and (5) to assign any remaining channels to communities based on population, geographic location, and the number of television services available to the community from stations located in other communities. *Sixth Report and Order,* 41 FCC 148, 167 (1952).

purposes of determining whether a grant of the Petition will result in a preferential arrangement of allotments. *See Modification of FM and TV Authorizations to Specify a New Community of License*, 4 FCC Rcd 4870, 4873 [¶ 25] (1989) (Commission compares proposed allotment plan to existing state of allotments *for the communities involved*). Taken together or separately, however, the proposals clearly further the Commission's allotment priorities. Specifically, they will eliminate "white" area by providing the first television reception service to a large population and area; they will provide first local television service to two new communities while the current communities will each retain local television service; and they will eliminate "gray" area by providing the second television reception service to a large area and population. Thus, grant of the Petition furthers television allotment priorities 1, 2, and 3.

5. This case is similar to, but stronger than, another television reallotment recently granted by the Commission. In *International Falls and Chisholm, Minn.*, 16 FCC Rcd 17864 (2001), the Commission removed the sole television allotment from International Falls and moved it to the smaller community of Chisholm, Minnesota. The petitioners in that case had stated that the reallotment would further priorities 1, 2, and 3 by eliminating white and gray area and creating a new first local service.[2] Grant of this Petition is virtually compelled by that case. Just as in that case, the Santaquin and Caliente reallotments would further priorities 1, 2, and 3, and unlike International Falls in that case, neither Vernal nor Ely in this case will be left without local television service.

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[2] In fact, however, Chisholm would *not* have been preferred over International Falls under priority 2 (first local television service). Neither community had another television service, so Channel 11 would have been a first local service in either International Falls or Chisholm. Since the Commission gives a preference to the community with the larger population in such cases, International Falls should have been preferred. Therefore, careful analysis reveals that the Chisholm reallotment did not further priority 2. Here, by contrast, as demonstrated below, neither existing community will be deprived of its only local television service.

A. Grant of the Petition will Further the Commission's First Priority, to Provide at Least One Television Service to All Parts of the United States.

6. The Commission's first priority in television allocations is to provide at least one television service to all parts of the United States. The Santaquin and Caliente reallotments, individually and together, further this first priority because they will each eliminate "white" areas (areas that do not receive any over-the-air television service). The accompanying Technical Narrative demonstrates that the Santaquin reallotment will provide service to a white area of 5,277 sq. km. containing 14,515 persons (2000 Census). Likewise, the Caliente reallotment will provide service to a white area of 11,130 sq. km. containing 1,077 persons (2000 Census).[3] Thus, together, grant of the petition will eliminate existing white areas totaling 16,407 sq. km. and 15,592 persons. *See International Falls and Chisholm, Minnesota*, 16 FCC Rcd 17684, 17685 (2001) (reallotment proposal would provide service to white areas at new location, furthering priority one).

7. While there also is a white area inside the predicted coverage areas of the existing allotments at Vernal, this white area is not *created* by the reallotment to Santaquin because it currently receives no service. Both the Vernal and Ely allotments are unbuilt construction permits, and are not considered "existing" stations for the purposes of calculating white area. *See Farmington and Gallup, New Mexico*, 11 FCC Rcd 2357, 2360 (1996) (removal of unbuilt station will not create white area, but rather will perpetuate a preexisting white area), *recon denied*, 14 FCC

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[3] In the NPRM, the Commission relies on a staff engineering study for its white area analysis. NPRM at ¶¶ 6, 8. The results of that study differ significantly from the results derived by Petitioners, even when similar census data are used throughout. Petitioners have described in detail the methods by which they obtained their results. See Technical Narrative. Those methods are established by Commission precedent and validated in many other proceedings. By contrast, the Commission did not disclose the methods by which it arrived at its significantly different results. Accordingly, Petitioners respectfully request that a discussion of the methods employed by the Commission's staff accompany any further analyses upon which the Commission may rely in deciding this case.

Rcd 18983 (1999).[4] Thus, there is no need to conduct a white area gain and loss comparison. However, even if the white area gains and losses are compared, the Santaquin and Caliente reallotments are preferred because they provide first television reception service to a greater population than the existing allotments at Vernal and Ely, respectively.[5]

8. The following table summarizes the gains under the first television allotment priority:

Community	White Area	
	Population (2000 Census)	Area (square kilometers)
Santaquin (proposed)	14,515	5,277
Vernal (existing)	1,075	8,188
Caliente (proposed)	1,077	11,130
Ely (existing)	0	0

B. Grant of the Petition will Further the Commission's Second Priority, to Provide Each Community With At Least One Television Service.

9. The Commission's second priority in television allocations is to provide each community with at least one television service. Both the Santaquin reallotment and the Caliente reallotment further this second priority because in both cases a channel is being moved from a

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4 In that case, the Commission held that the reallotment from Gallup to Farmington furthered priority 1 even though the Farmington allotment provided a first television service to only 3,366 persons, while at Gallup it could potentially have provided a first television service to over 62,000 persons. 11 FCC Rcd at 2361.

5 The NPRM states that the reallotment from Ely would create white area. NPRM at ¶ 8. However, the Commission may have failed to take into account the service provided by Channel 3 at Ely. *See* NPRM at ¶ 11(omitting Channel 3 allotment). In computing the potential white area for the Ely allotment, Petitioners used the facilities of Channel 3 at Ely which were applied for at the time the Petition was filed. Subsequently, the Channel 3 licensee filed an application to reduce power from 100kW to 1.08 kW. Since Petitioners' proposal to relocate from Ely to Caliente was on file before the Channel 3 downgrade, Channel 3 should be held responsible for the white area loss attributable to its downgrade. *See Paonia and Olathe, Colorado*, DA 01-2909 (rel. Dec. 14, 2001) (when two proposals are filed for the same community, only the first proposal is considered to offer a first local service), *citing Galveston and Missouri City, Texas*, 16 FCC Rcd 747 (2001).

community with more than one local television service to a community with no television service.

10. As discussed in the petition for rule making, Santaquin, Utah (2000 pop. 4,834) is a "community" for allotment purposes. Santaquin has no local television service. By contrast, Vernal, Utah (2000 pop. 7,714) currently has *two* local television services: Channel 6 (which Petitioners are proposing to move to Santaquin), and Channel *17, for which an application is on file (File No. BPET-960705KJ). Moreover, although the Commission generally is concerned with the removal of a community's sole existing service, that concern is not at issue here since the Channel 6 facility is not built and therefore does not represent a service upon which the public has become reliant. *See International Falls and Chisholm, Minn., supra*, 16 FCC Rcd at 17865; *Lake Havasu City and Laughlin, Nevada*, 15 FCC Rcd 11664 (2000). Accordingly, a new television allotment at Santaquin clearly is preferred over a second allotment at Vernal.

11. Likewise, Caliente, Nevada (2000 pop. 1,123) is a "community" for allotment purposes, and has no local television service. By contrast, Ely, Nevada (2000 pop. 4,041) currently has *two* local television services: Channel 6 (which Petitioners are proposing to move to Caliente) and Channel 3, for which a construction permit has been issued under the call sign KBJN.[6] Again, the Channel 6 allotment is unbuilt, and hence does not represent a service upon which the public has come to rely. Accordingly, a new allotment at Caliente is preferred over a second allotment at Ely.

12. The following table summarizes the gains under the second television allotment priority:

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[6] In the NPRM, the Commission states erroneously that Petitioners' proposal would remove the sole local television at Ely. NPRM at ¶ 10. This is clearly incorrect, since KBJN, Channel 3, not only is an existing allotment, but the station has been constructed and a license application has been filed. File No. BLCT-0010713ABQ.

Community	Channel	
	Existing	Proposed
Santaquin, Utah	---	6
Vernal, Utah	6, *17	*17
Caliente, Nevada	---	6
Ely, Nevada	3, 6	3

C. Grant of the Petition will Further the Commission's Third Priority, to Provide a Choice of At Least Two Television Services to All Parts of the United States.

13. The Commission's third priority in television allotments is to provide a choice of at least two television services to all parts of the United States. The Santaquin reallotment and the Caliente reallotment, individually and together, further this third priority because they will each offer a second video service to a substantial area and population. The accompanying Technical Narrative demonstrates that the Santaquin reallotment will provide service to a gray area of 8,667 sq. km. containing 43,048 persons (2000 Census). Likewise, the Caliente reallotment will provide service to a gray area of 16,765 sq. km. containing 13,045 persons (2000 Census). Thus, together, grant of the petition will eliminate gray areas totaling 25,432 sq. km. and 56,093 persons. *See International Falls and Chisholm, Minnesota*, 16 FCC Rcd 17684, 17685 (2001) (reallotment proposal would provide service to gray areas at new location, furthering priority three).

14. While there are also gray areas inside the predicted coverage areas of the existing allotments at Vernal and Ely, respectively, these gray areas are not *created* by the reallotments because they currently receive no service. Both the Vernal and Ely allotments are unbuilt construction permits, and are not considered "existing" stations for the purposes of calculating gray area. *See Farmington and Gallup, New Mexico*, 11 FCC Rcd 2357, 2360 (1996), *recon denied*, 14

FCC Rcd 18983 (1999). Thus, just as with white area, there is no need to conduct a gray area gain and loss comparison. However, even if the gray area gains and losses are compared, the Santaquin and Caliente reallotments are preferred because they provide a second television reception service to a greater population than the existing allotments at Vernal and Ely, respectively.[7]

15. The following table summarizes the gains under the third television allotment priority:

Community	Gray Area	
	Population (2000 Census)	Area (square kilometers)
Santaquin (proposed)	43,048	8,667
Vernal (existing)	42,034	26,835
Caliente (proposed)	13,045	16,765
Ely (existing)	10,368	30,480

III. REQUEST FOR EXPEDITED ACTION

In the Petition, Petitioners requested expedited consideration because the construction permit for Channel 6 at Vernal, Utah was set to expire on December 21, 2000. Despite this plea, almost 19 months passed between the filing of the Petition and the issuance of the NPRM. A tolling request has been filed with the Commission to toll the time for construction of Channel 6. Given the substantial benefits to be realized by the grant of the proposals before the Commission, Petitioners renew their request for expedited processing of this proceeding.

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[7] The Santaquin and Caliente reallotments each result in a net gain in population within the gray area (*i.e.* service to persons who currently receive only one existing television service). While each reallotment also results in a corresponding net loss in the geographic size of the gray area, the Commission has held that population is the critical factor, not area. *See Meeker and Craig, Colorado*, 15 FCC Rcd 23858 (2000) (coverage of white area does not further priority 1 when that area is unpopulated).

IV. CONCLUSION

Petitioners request that the Commission amend the Table of TV Allotments as described herein and modify Petitioners' construction permits accordingly, in order to realize the substantial public interest benefits to be gained thereby.

Respectfully submitted,

TV 6 L.L.C. and
KALEIDOSCOPE FOUNDATION, INC.

By: _____

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January 14, 2002

TECHNICAL EXHIBIT
IN SUPPORT OF COMMENTS
IN THE NOTICE OF PROPOSED RULE MAKING
TO AMEND THE NTSC TV TABLE OF ALLOTMENTS
VERNAL AND SANTAQUIN, UTAH,
ELY, NEVADA AND CALIENTE, NEVADA

Technical Narrative

This technical narrative and associated exhibits have been prepared on behalf of NTSC TV stations KBNY, channel 6, Ely, NV and KBCJ, channel 6, Vernal, UT ("Petitioners") in support of comments in the Notice of Proposed Rule Making in MM Docket No. 01-323 ("NPRM"). The NPRM proposes the reallotment of NTSC channel 6 from Ely to Caliente, NV and the reallotment of channel 6 from Vernal to Santaquin, UT and modification of the construction permits at Ely (BPET-970331LN) and at Vernal (BPCT-19960919KG). The purpose of these comments is to provide detailed information concerning the Grade B gain and loss areas, including white and gray area analyses. These analyses are based on 2000 Census population figures. In addition, information is provided concerning local service within each community.

The following is a summary of these comments:

I. *Ely and Caliente, NV*

- Caliente, NV will be provided with its first local NTSC TV transmission facility.
- Ely, NV will not be deprived of its sole local NTSC service as station KBNY is an unconstructed station and not a service upon which the public has come to rely on. Furthermore, NTSC station KBJN is authorized to operate on channel 3 at Ely (BMPCT-20010523ABJ) and has a license application pending to implement its authorized facilities (BLCT-20010713ABQ).
- The number of persons within the KBNY Grade B contour will increase from 10,372 persons to 90,460 persons, and there will be a "net" increase in Grade B coverage to 80,088 persons.
- The proposal will not create any white areas.
- The proposal will provide service to a white area containing 1,077 persons.
- The proposal will increase gray area coverage by 2,677 persons.

II. *Vernal and Santaquin, UT*

- Santaquin, UT will be provided with its first local NTSC TV transmission service.
- Vernal, UT will not be deprived of its sole local NTSC service as station KBCJ is an unconstructed station and not a service upon which the public has come to rely on. Furthermore, noncommercial educational NTSC television channel 17 is currently allotted to Vernal with an application pending to activate the channel (BPET-19960705KJ).
- The number of persons within the KBCJ Grade B contour will increase from 55,368 persons to 621,638 persons, and there will be a "net" increase in Grade B coverage to 566,270 persons.
- The proposal will increase white area coverage by 13,440 persons.
- The proposal will increase gray area coverage by 1,014 persons.

III. *Combined Proposals - Vernal/Santiquin, UT and Ely/Caliente, NV*

- There will be a "net" Gain in Grade B service to 646,176 persons.
- The proposal will increase white area coverage by 14,517 persons.
- The proposal will increase gray area coverage by 3,691 persons.

Methodology Used for Determination of Grade B Gain and Loss Areas and Available Services

The Grade B contour locations for the authorized and proposed KBCJ and KBNY operations, as well as those of other stations providing service to the Grade B gain and loss areas, were determined based on actual facilities and terrain in accordance with the provisions of Section 73.684 and Figures 9, 10 and 10b of Section 73.699 except that, pursuant to current FCC practice, no consideration was given to terrain roughness correction factors. The average elevations from 3.2 to 16.1 kilometers from the transmitter site were obtained from the NGDC 30-second terrain database and were used for determining the distances to coverage contours every 10° of azimuth. It is noted that for those stations employing directional antennas,

the directional antenna pattern was used for the determination of the Grade B contour location. Except as noted below, only existing or authorized commercial and noncommercial full-service NTSC stations were considered for the analyses.

The population within each TV Grade B contour and each gain and loss area was calculated using a computer program that utilizes the 2000 U.S. Census database of "population centroids". The program adds the populations of those U.S. Census designated areas whose centroid was within each service area. The area within each TV Grade B contour was calculated using a root mean square algorithm.

Caliente Reallotment - Grade B Gain and Loss Areas and Available Services

Figure 1, attached, is a map showing the NTSC TV Grade B contours for the authorized KBNY operation on NTSC channel 6 at Ely and the proposed KBNY operation on NTSC channel 6 at Caliente. The facilities authorized in BPET-19970331LN (ERP 100 kW/HAAT 270 m) were used to determine the location of KBNY's authorized Ely Grade B contour and presumed facilities (Site 37°47'00"/114°30'00", ERP 100 kW nondirectional, HAAT 300 meters, RCAMSL 1965 meters) were used to determine the location of the proposed Caliente Grade B contour. The Grade B "gain" and "loss" areas are also indicated along with the other Grade B services available to the areas within the KBNY authorized and proposed Grade B contours. Figure 2 tabulates the TV stations whose Grade B contours are shown on Figure 1.

Figure 3 is a tabulation of the land areas and estimated populations within the KBNY authorized and proposed Grade B contours. Also tabulated are the gain, loss and "net" gain areas and the results of the determination of other available Grade B services for these areas. Adoption of the Petitioner's proposal will increase the number of persons within the KBNY Grade B contour from 10,372 persons to 90,460 persons, and will result in a "net" increase in Grade B coverage to 80,088 persons. In addition, adoption of the proposal will not create any white area and will result in service to a TV white area (0 existing, predicted Grade B

services) containing 1,077 persons within 11,161 square kilometers. Finally, adoption of the proposal will increase gray area (1 existing, predicted Grade B service) coverage by 2,677 persons.

The determination of the availability of other services to the gain and loss area is based on the "former" construction permit (CP) of KBJN on channel 3 at Ely, Nevada (BPCT-19970331LM). The former KBJN was used as it was the current CP when the Petitioners filed the original Petition for Rule Making. Thus, any loss area created by the subsequent authorization of the current KBJN CP (BMPCT-20010523ABJ) was created by KBNJ, not by the Petitioners proposal.

Caliente Reallotment - Local Service

Station KBNY is currently authorized (BPET-19970331LN) to operate on NTSC channel 6 at Ely, NV. Station KBNY is an unconstructed NTSC station and not a service upon which the public has come to rely. Therefore, adoption of the proposal will not deprive Ely of "existing" local NTSC television transmission service. Furthermore, NTSC station KBJN of channel 3 is also authorized to Ely (BMPCT-20010523ABJ).

Santaquin Reallotment - Grade B Gain and Loss Areas and Available Services

Figure 4, attached, is a map showing the NTSC TV Grade B contours for the authorized KBCJ operation on NTSC channel 6 at Vernal and the proposed KBCJ operation on NTSC channel 6 at Santaquin. The facilities authorized in BPCT-19960919KG (ERP 83.2 kW/HAAT 676 m) were used to determine the location of KBCJ's authorized Vernal Grade B contour and presumed facilities (Site 39°43'58"/111°56'34", ERP 100 kW nondirectional, HAAT 305 meters, RCAMSL 2047 meters) were used to determine the location of the proposed Santaquin Grade B contour. The Grade B "gain" and "loss" areas are also indicated along with the other Grade B services available to the areas within the KBCJ authorized and proposed Grade B contours. Figure 5 tabulates the TV stations whose Grade B contours are shown on Figure 4.

Figure 6 is a tabulation of the land areas and estimated populations within the KBCJ authorized and proposed Grade B contours. Also tabulated are the gain, loss and "net" gain areas and the results of the determination of other available Grade B services for these areas. Adoption of the Petitioner's proposal will increase the number of persons within the KBCJ Grade B contour from 55,368 persons to 621,638 persons, and will result in a "net" increase in Grade B coverage to 566,270 persons. In addition, adoption of the proposal will increase white area (0 existing, predicted Grade B services) coverage by 13,440 persons. Finally, adoption of the proposal will increase gray area (1 existing, predicted Grade B service) coverage by 1,014 persons.

The determination of the availability of other services to the gain and loss area is based on consideration of the pending application for noncommercial educational NTSC television channel 17 at Santaquin (BPET-19960705KJ) which appears to comply with all the FCC's technical criteria.

Santaquin Reallotment - Local Service

Station KBCJ is currently authorized (BPCT-19960919KG) to operate on NTSC channel 6 at Vernal, UT. Station KBCJ is an unconstructed NTSC station and not a service upon which the public has come to rely. Therefore, adoption of the proposal will not deprive Vernal of "existing" local NTSC television transmission service. Furthermore, noncommerical educational NTSC television channel 17 is currently allotted to Vernal with an application pending to activate the channel (BPET-19960705KJ) which appears to comply with all the FCC's technical criteria.

Conclusion

The proposal will result in a first local NTSC television transmission service to Caliente, NV and Santaquin, UT. The proposal would not deprive either Ely, NV or Vernal, UT

of local NTSC television transmission service. There will be a "net" gain in Grade B service to 646,176 persons. The proposal will increase white area coverage by 14,517 persons. The proposal will increase gray area coverage by 3,691 persons.

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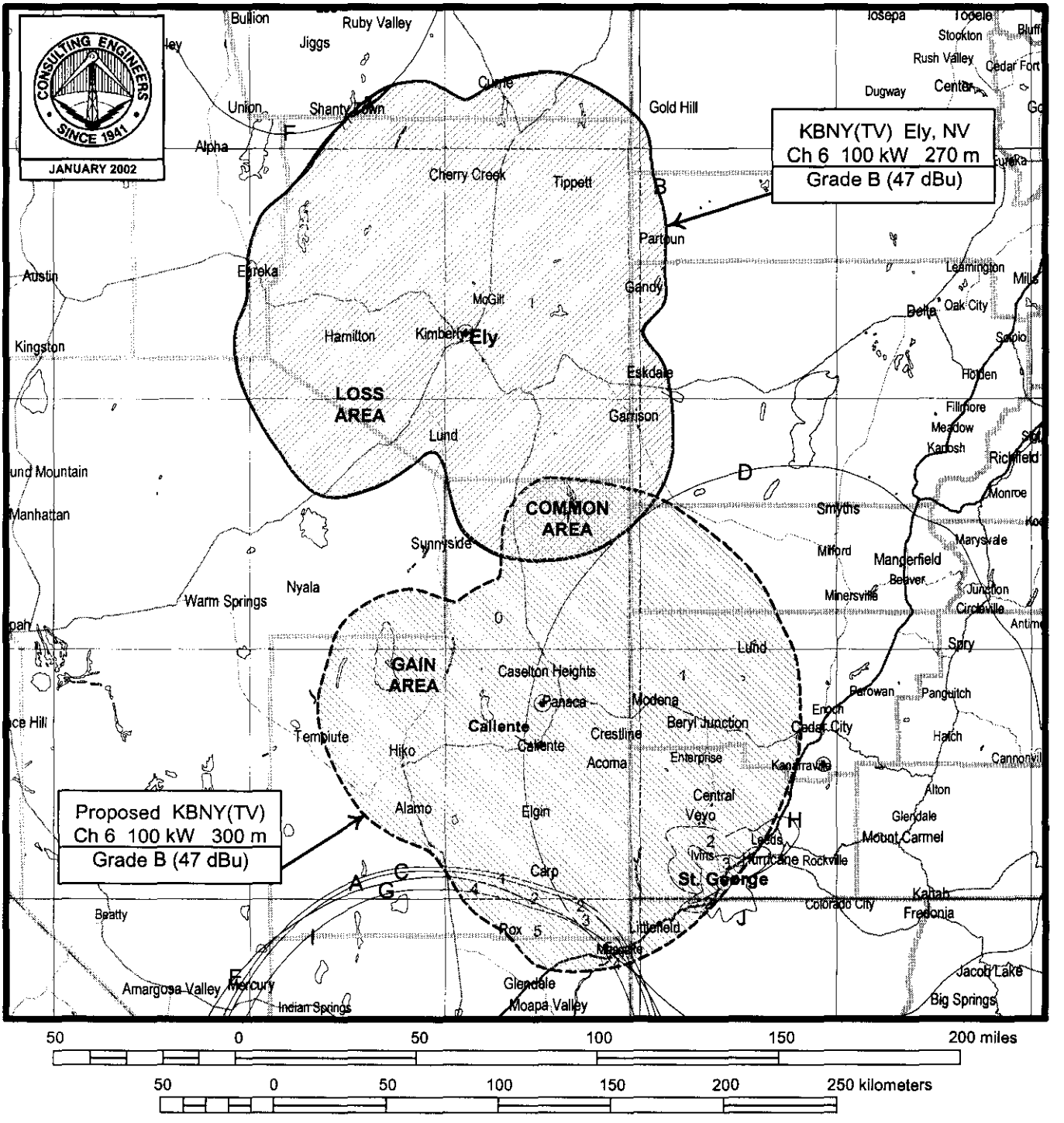
January 11, 2002

Figure 1



GRADE B SERVICES

STATION KBNY(TV)
CHANNEL 6
CALIENTE, NEVADA

du Treil, Lundin & Rackley, Inc., Sarasota, Florida

OTHER TV STATIONS PROVIDING SERVICE TO GAIN AREA

Map ID	Call Letters	Location	Authorized Facilities
A	KVBC(TV)	Las Vegas, NV	Ch. 3, 100 kW/387 m
B	KBJN(TV)CP(former CP)	Ely, NV	Ch. 3, 100 kW/270 m
C	KVVU-TV	Henderson, NV	Ch. 5, 100 kW/363 m
D	KCSG(TV)	Cedar City, UT	Ch. 4, 38 kW/836 m
E	KTNV(TV)	Las Vegas, NV	Ch. 13, 316 kW/610 m
G	KLAS-TV	Las Vegas, NV	Ch. 8, 316 kW/610 m
H	KUSG(TV)	St. George, UT	Ch. 12, 10 kW/42 m
I	KLVX(TV)	Las Vegas, NV	Ch. 10, 295 kW/372 m
J	KUEW(TV) CP	St. George, UT	Ch. 18, 6.31 kW/48 m

OTHER TV STATIONS PROVIDING SERVICE TO LOSS AREA

Map ID	Call Letters	Location	Authorized Facilities
B	KBJN(TV)CP(former CP)	Ely, NV	Ch. 3, 100 kW/270 m
F	KENV(TV)	Elko, NV	Ch. 10, 3.09 kW/564 m

TECHNICAL EXHIBIT
IN SUPPORT OF
A PETITION FOR RULE MAKING
TO AMEND THE NTSC TV TABLE OF ALLOTMENTS
ELY, NEVADA AND CALIENTE, NEVADA

Tabulation of Areas, Populations and Grade B
Services Within KBNY Authorized and Proposed Grade B Contours

I. Population and Land Area Within Grade B Contours

Area	2000 Census Population	Area (km^2)
Authorized Grade B Ch. 6 Ely	10,372	32,350
Proposed Grade B Ch. 6 Caliente	90,460	32,800

II. Population and Land Area Within Gain and Loss Areas

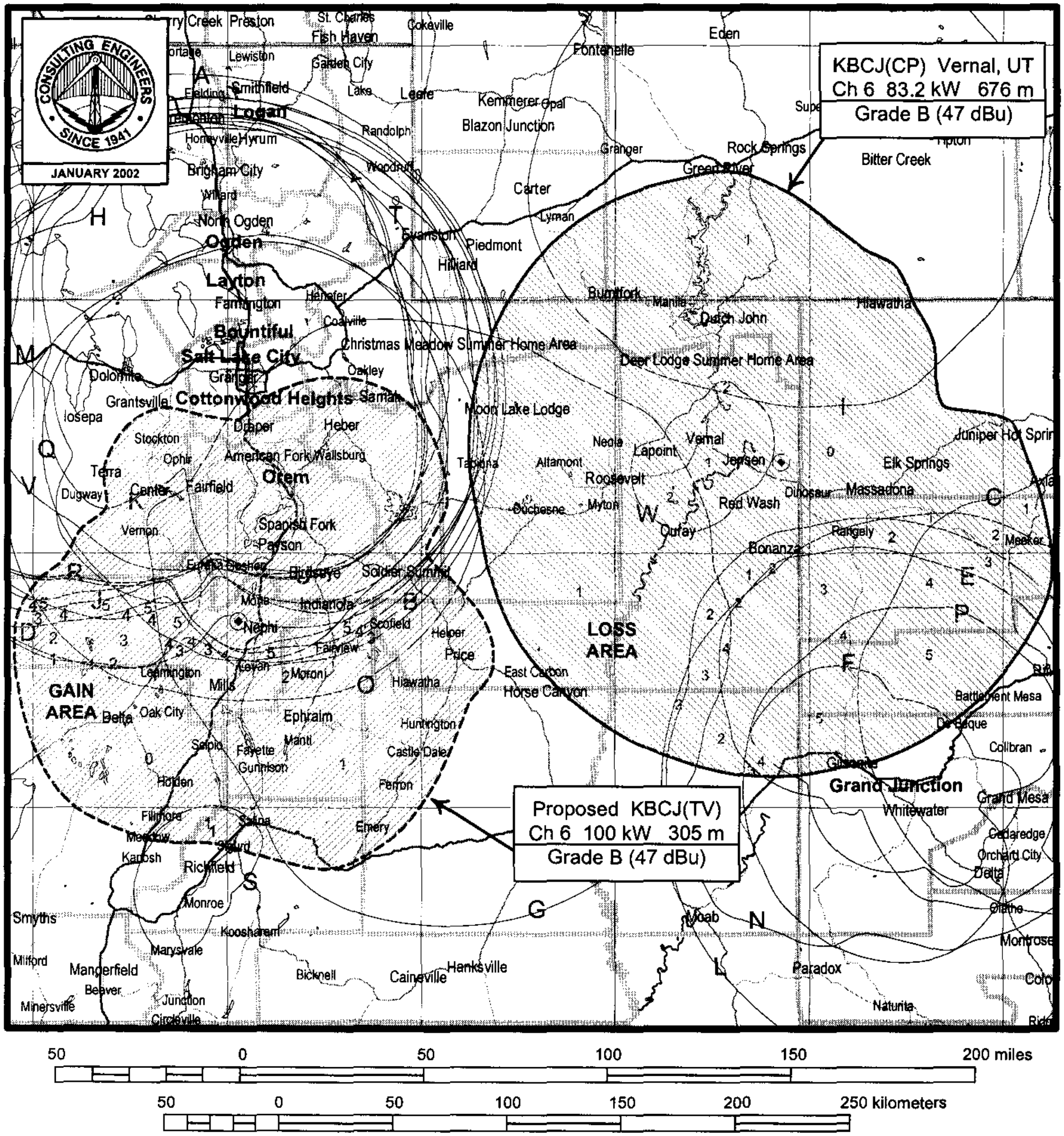
Area	2000 Census Population	Area (km^2)
Grade B Gain Area	90,456	30,973
Grade B Loss Area	10,368	30,523
Grade B "Net" Gain Area	80,088	450

III. Available Grade B Service Within Grade B Gain and Loss Areas

Area	No. of Grade B Services	Within Grade B Contour	
		2000 Census Population	Area (km^2)
Loss Area	1	10,368	30,480
	2	0	43

Area	No. of Grade B Services	Within Grade B Contour	
		2000 Census Population	Area (km^2)
Gain Area	5 or more	698	1,190
	4	392	227
	3	68,784	554
	2	6,460	1,107
	1	13,045	16,765
	0	1,077	11,130

Figure 4



OTHER GRADE B SERVICES TO GAIN AND LOSS AREAS

STATION KBCJ(TV)
CHANNEL 6
SANTAQUIN, UTAH

du Treil, Lundin & Rackley, Inc., Sarasota, Florida

OTHER TV STATIONS PROVIDING SERVICE TO GAIN AREA

A	KSL-TV	Salt Lake City, UT	Ch. 5, 33.9 kW/1,152 m
B	KTVX(TV)	Salt Lake City, UT	Ch. 4, 32.4 kW/1180 m
D	KUTV(TV)	Salt Lake City, UT	Ch. 2, 45.7 kW/933 m
G	NEW (CP)	Price, UT	Ch. 3, 89.1 kW/654 m
H	KBYU-TV	Provo, UT	Ch. 11, 162 kW/896 m
J	KUED(TV)	Salt Lake City, UT	Ch. 7, 155 kW/924 m
K	KULC(TV)	Ogden, UT	Ch. 9, 166 kW/893 m
M	KSTU(TV)	Salt Lake City, UT	Ch. 13, 112 kW/1116 m
O	NEW (CP)	Provo, UT	Ch. 32, 1450 kW/861 m
Q	KUPX(TV)	Provo, UT	Ch. 16, 2000 kW/847 m
R	KAZG(TV)(CP)	Ogden, UT	Ch. 24, 1514 kW/1229 m
S	KUES(TV)(CP)	Richfield, UT	Ch. 19, 1.2 kW/441 m
T	KJZZ-TV	Salt Lake City, UT	Ch. 14, 1410 kW/1181 m
U	KUWB(TV)	Ogden, UT	Ch. 30, 1486 kW/1242 m
V	KTMW(TV)(CPMOD)	Salt Lake City, UT	Ch. 20, 1660 kW/1171 m

OTHER TV STATIONS PROVIDING SERVICE TO LOSS AREA

A	KSL-TV	Salt Lake City, UT	Ch. 5, 33.9 kW/1,152 m
B	KTVX(TV)	Salt Lake City, UT	Ch. 4, 32.4 kW/1180 m
C	KREG-TV	Glenwood Springs, CO	Ch. 3, 67.6 kW/771 m
D	KUTV(TV)	Salt Lake City, UT	Ch. 2, 45.7 kW/933 m
E	KFQX(TV)	Grand Junction, CO	Ch. 4, 10.7 kW/422 m
F	KREX-TV	Grand Junction, CO	Ch. 5, 12.9 kW/-23 m
G	NEW (CP)	Price, UT	Ch. 3, 89.1 kW/654 m
H	KBYU-TV	Provo, UT	Ch. 11, 162 kW/896 m
I	KGWR-TV	Rock Springs, WY	Ch. 13, 209 kW/495 m
J	KUED(TV)	Salt Lake City, UT	Ch. 7, 155 kW/924 m
K	KULC(TV)	Ogden, UT	Ch. 9, 166 kW/893 m
L	KJCT(TV)	Grand Junction, CO	Ch. 8, 120 kW/829 m
N	KKCO(TV)	Grand Junction, CO	Ch. 11, 155 kW/394 m
O	NEW (CP)	Provo, UT	Ch. 32, 1450 kW/861 m
P	KRMJ(TV)	Grand Junction, CO	Ch. 18, 186 kW/883 m
W	NEW(APP)	Vernal, UT	Ch. 17, 6.03 kW/-120 m

TECHNICAL EXHIBIT
IN SUPPORT OF
A PETITION FOR RULE MAKING
TO AMEND THE NTSC TV TABLE OF ALLOTMENTS
SANTAQUIN, UTAH AND VERNAL, UTAH

Tabulation of Areas, Populations and Grade B
Services Within KBCJ Authorized and Proposed Grade B Contours

I. Population and Land Area Within Grade B Contours

Area	2000 Census Population	Area (km^2)
Proposed Grade B Ch. 6 Santaquin	621,638	33,430
Authorized Grade B Ch. 6 Vernal	55,368	49,800

II. Population and Land Area Within Gain and Loss Areas

Area	2000 Census Population	Area (km^2)
Grade B Gain Area	621,638	33,430
Grade B Loss Area	55,368	49,800
Grade B "Net" Gain Area	566,270	-16,370

III. Available Grade B Service Within Grade B Gain and Loss Areas

Area	No. of Grade B Services	Within Grade B Contour	
		2000 Census Population	Area (km^2)
Loss Area	0	1,075	8,188
	1	42,034	26,835
	2	8,213	3,021
	3	101	4,798
	4	122	1,993
	5 or more	3,823	4,965

Area	No. of Grade B Services	Within Grade B Contour	
		2000 Census Population	Area (km^2)
Gain Area	0	14,515	5,277
	1	43,048	8,667
	2	6,993	2,233
	3	1,743	1,306
	4	668	594
	5 or more	554,671	5,353